

IN THE SUPERIOR COURT OF DEKALB COUNTY
STATE OF GEORGIA

Civil Action # 11CV12748-10

V. Long

Plaintiff

VS

E. Long

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Michael W. Tyler, Esq.
Kilpatrick Townsend & Stockton LLP
1100 Peachtree, Suite 2800
Atlanta, Georgia 30309-4528

Adrienne Hunter-Strothers
Warner Maynard Bates & McGough
3350 Riverwood Parkway, Suite 2300
Atlanta, Georgia 30339

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, or if service by publication within 60 days of judges order of publication, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 1 day of December, 2011

Debra DeBerry
Clerk of Superior Court

By: [Signature]
Deputy Clerk

DISCLOSURE STATEMENT CLERK OF SUPERIOR COURT

VANESSA G. LONG,

Petitioner,

v.

EDDIE L. LONG,

Respondent.

CIVIL ACTION
FILE NO. 11CV12748-70

TYPE OF ACTION

- | | |
|--|--|
| 1. <input checked="" type="checkbox"/> Divorce without Agreement Attached | 11. <input type="checkbox"/> URESA |
| 2. <input type="checkbox"/> Divorce with Agreement Attached | 12. <input type="checkbox"/> Name Change |
| 3. <input type="checkbox"/> Domestic Relations | 13. <input type="checkbox"/> Other |
| 4. <input type="checkbox"/> Damages arising out of Contract | 14. <input type="checkbox"/> Recusal |
| 5. <input type="checkbox"/> Damages arising out of Tort | 15. <input type="checkbox"/> Adoption |
| 6. <input type="checkbox"/> Condemnation | |
| 7. <input type="checkbox"/> Equity | |
| 8. <input type="checkbox"/> Zoning - County Ordinance violations (i.e. Injunctive relief-zoning) | |
| 9. <input type="checkbox"/> Zoning appeals (denovo) | |
| 10. <input type="checkbox"/> Appeal, Including denovo appeal - excluding Zoning | |

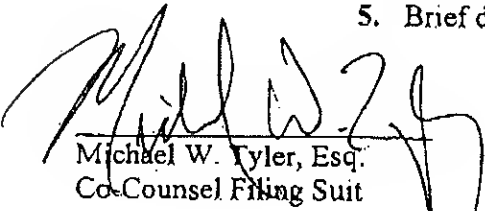
PREVIOUS RELATED CASES

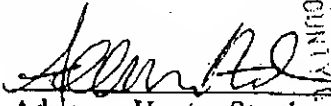
Does this case involve substantially the same parties, or substantially the same subject matter, or substantially the same factual issues, as any other case filed in this court? (Whether pending simultaneously or not.)

☒ NO☐ YES

If yes, please fill out the following:

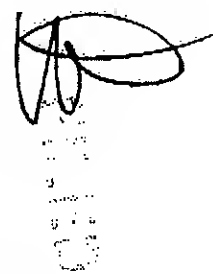
1. Case:
2. Parties:
3. Assigned Judge:
4. Is this case still pending? ☐ Yes ☐ No
5. Brief description of similarities:


Michael W. Tyler, Esq.
Co-Counsel Filing Suit


Adrienne Hunter-Strothers, Esq.
Co-Counsel Filing Suit

CLERK OF SUPERIOR COURT
GENERAL COUNTY

2011 DEC - 1 D



IN THE SUPERIOR COURT OF DEKALB COUNTY

STATE OF GEORGIA

VANESSA G. LONG,

Petitioner,

v.

EDDIE L. LONG,

Respondent.

CIVIL ACTION

FILE NO. 11CM2748-10PETITION FOR DIVORCE

COMES NOW, VANESSA G. LONG, Petitioner above, and presents this Petition for Divorce as follows:

1.

The Petitioner is now and has been for more than six months preceding the filing of this Petition a resident of the State of Georgia.

2.

The Respondent is currently a resident of DeKalb County, State of Georgia and is subject to the jurisdiction and venue of this Court. Service will be perfected as allowed by law.

3.

The parties are husband and wife, having been lawfully married on or about March 10, 1990. The parties are currently living in a bona fide state of separation.

4.

There have been two (2) children born as issue of the marriage and who have reached the age of majority to wit: [REDACTED] LONG, born [REDACTED] and [REDACTED] LONG, born [REDACTED]
[REDACTED]

5.

Petitioner is entitled to receive temporary and permanent alimony and an award of attorney's fees from Respondent.

6.

Petitioner further shows that she is entitled to an equitable division of the marital property of the parties and to be awarded her separate, non-marital property.

7.

Petitioner is entitled to a divorce from Respondent upon the ground that the marriage between the parties is irretrievably broken, as defined in O.C.G.A. §19-5-3(13), there being no hope of reconciliation of the parties, and it being in the best interest of all parties concerned that this marriage be terminated by divorce. Petitioner expressly reserves the right to amend this Petition to include additional grounds for divorce.

8.

By this action, Petitioner puts Respondent upon notice that he is bound by the provisions of O.C.G.A. §19-5-7 which provide in part as follows:

"After a complaint for divorce has been filed, no transfer of property by either party, except a bona fide transfer in payment of preexisting debts, shall pass title so as to avoid the vesting thereof according to the final verdict of the jury in the case...."

Further, Respondent is bound by the provisions of O.C.G.A. § 19-6-1(e), which provide as follows with respect to the transferring or disposition of property:

"Pending the final determination by the court of the right of either party to alimony, neither party shall make any substantial change in the assets of the parties' estate, except in the course of ordinary business affairs and except for bona fide transfers for value."

9.

Petitioner is entitled to a trial by jury.

10.

Petitioner is hopeful the parties will reach an agreement settling all issues pending between them; however, if such an agreement cannot be reached, Petitioner reserves the right to amend this Petition accordingly.

WHEREFORE, Petitioner prays:

- (a) That process issue and the Respondent be served with a copy of the Summons and Petition for Divorce as allowed by law;
- (b) That the Standing Order of this Court issue;
- (c) That Petitioner be granted a total divorce upon legal principles; that is, a divorce a vinculo matrimonii;
- (d) That Petitioner be awarded temporary and permanent alimony from Respondent;
- (e) That Petitioner be awarded temporary and permanent attorney's fees from Respondent;
- (f) That Petitioner be awarded an equitable division of the marital property of the parties and to be awarded her separate, non-marital property;
- (g) That Petitioner be granted a trial by jury; and

(h) That Petitioner be awarded such other and further relief as this court deems just and equitable in the premises.

This 1st day of December, 2011.

KILPATRICK TOWNSEND & STOCKTON LLP

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Attorneys for Petitioner

CLERK OF SUPERIOR COURT
DEKALB COUNTY, GA

2011 DEC - 1 P 12:00

FILED